

COHEN & GREEN

December 3, 2021

District Judge Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

By Electronic Filing.

Re: Carol Lopez v. City of New York, et al., 20-cv-2502-LJL

Dear Judge Liman:

My firm represents the Plaintiff in this matter. I write jointly¹ with counsel for Defendants, asking for a handful of extensions on discovery. The current end of discovery is December 9, 2021.

By way of background, the Court previously granted an extension (among other reasons) because “Plaintiff currently intends to file a motion to amend the Complaint,” which was intended to address Doe issues. The parties have been attempting to cooperatively address Doe issues before diving deeper into discovery (while also discussing settlement). We anticipate being able to amend the Complaint, with information Defendants are providing, in the next few weeks. Additionally, Plaintiff’s injuries have required further treatment, and the parties will need time to obtain the relevant records.

Given that, along with the fact that Defendants still object to all *Monell* discovery and that remains unresolved, the parties anticipate that they will need a significant extension. Accordingly, the parties ask the Court to extend the current discovery deadline to May 31, 2022. And I have attached an agreed, updated case management plan.

As always, we thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

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cc:

¹ As a technical matter, Plaintiff asks to extend her deadlines, to which Defendants consent, while Defendants ask to extend their deadlines, to which Plaintiff consents.



All relevant parties by ECF and Email.